

People for Safe Water
254 W. Third St.
Springfield, OH 45504

June 24, 2016

Mr. Robert Kaplan, Acting Regional Administrator
US EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dear Mr. Kaplan,

We met with Mr. Jim Saric on June 15th and received the ACE's Final Evaluation of Supplemental Engineering Controls (ECs) for the Tremont City Barrel Fill site. While our discussion at that meeting referenced the report in generalities, we have since reviewed it in detail and share a few of our most pressing concerns.

1) Options evaluated and current selected remedy

We asked that EPA consult with us regarding options the Army Corps was to consider. This did not happen, and options of interest to the community were not included. We respectfully request copies of the two Inter-Agency Agreements (IAs) from Region 5 to the Army Corps. According to the report, the current remedy was summarized in the first IA. We do not know what the remedy was which was presented to the Corps, considering that some alterations had already been assumed (removal of slurry wall and addition of second liner).

2) Omission of characteristic of toxicity in evaluating substances that meet the definition of characteristic hazardous waste

EPA's definition of characteristic hazardous waste includes those substances that exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity. Yet in evaluating supplemental ECs, only ignitability, corrosivity and reactivity were considered. Toxicity was not, even though this is the characteristic of the hazardous soil and much of the waste and the only characteristic that evaluates contaminant mobility. EPA's evolving remedy needs to address all hazardous characteristics, including toxicity. The Army Corps' recommended option does not.

3) Discrepancy in quantities and cost estimates used in the report with previous EPA documents

Plan 4a includes cost estimates of \$13.8 million for removing 37,000 tons of toxic hazardous soils. Ohio EPA and our community have repeatedly challenged both this quantity and estimated costs, with no substantive response from Region 5. Yet, the ACE report cites "soils/solids characterized as hazardous waste... (total of 18,400 CY)," noting "It is assumed that all solid material encountered in the estimated 51,500 drums will be characterized as hazardous waste and that the 18,400 CY includes all that material." (pg. 7) Using a conversion of 2600 pounds per cubic yard, the ACE report total equals 23,900 tons of hazardous waste, *which include solids and soils*. Where did this figure come from? And, if the latter is accurate, Plan 4a's cost estimate is glaringly exaggerated.

4) Omission of substantive capture of VOCs

In addition to omitting reference to hazardous waste toxicity characteristics, specific risks associated with exposure of VOCs to air are not dealt with. The toxic load to workers onsite is mentioned but the actual procedure for treating VOC emissions and related costs are never considered or added to the cost estimates. This is unacceptable! What will the cleanup plan be for the VOC hazardous soils and drum waste?

In summary, the ACE report's proposed revision to Plan 9a does not include an option for onsite treatment of toxic VOC soils and associated costs. Its cost estimate attachment does not even mention VOCs. Its total estimated volume of hazardous waste and soils diverges substantially from your Plan 4a. In addition to how toxic VOCs will be dealt with, we request a re-evaluation of hazardous waste and soil volumes and costs, including the derivation of those volumes and costs as critical next steps for moving forward. We respectfully request the opportunity to comment further on the ACE report once we have seen the IAs. We are committed to working with US EPA for the cleanup plan which will be most protective of human health and the environment.

Respectfully yours,

Marlene Wellen

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Marilyn Welker
President, People for Safe Water

Cc: Mr. Craig Butler, Director, Ohio EPA
Mr. Doug Ballotti, Acting Director, Superfund Division, US EPA
Ms. Joan Tanaka, Program Manager, Region 5 Superfund
Mr. Jim Saric, Project Manager, Region 5 Superfund
Ms. Susan Pastor, Community Involvement Coordinator
Mr. Mike Proffitt, Chief, DERR, Ohio EPA
Mr. Chuck Mellon, Senior Site Coordinator, Ohio EPA Southwest District
Mr. Charles Patterson, Commissioner, Clark County Combined Health District
Springfield City Commissioners: Joyce Chilton, Mayor Warren Copeland, Karen Duncan, Dan Martin, Kevin O'Neill
Clark County Commissioners: David Herier, Rick Lohnes, John Detrick
German Township Trustees: Rod Kaffenbarger, Bob Hart, Charles Metzger
David Farrell, President, Clark County Trustee Association
Mr. Jim Bodenmiller, Springfield City Manager
Mr. Mike McDorman, President, Greater Springfield Chamber of Commerce
Mr. Horton Hobbs, Vice President of Economic Development, Greater Springfield Chamber of Commerce
New Carlisle City Council members: Mayor Mike Lowrey, Vice Mayor John Krabacher, William Lindsey, Rick Lowrey, Lowell McGlothlin, William McIntire, Ethan Reynolds
U.S. Senator Sherrod Brown
U.S. Senator Rob Portman
U.S. Representative Warren Davidson
State Senator Bob Hackett
State Representative Kyle Koehler
State Representative Bill Dean
Mr. Michael Cooper, Staff Writer, *Springfield News-Sun*